

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA

v.

YASSIN YUSUF

)
)
) No. 3:10-00260
) JUDGE HAYNES
)

*ON 10/31/11
Tunison
John S
SANTO
Jill J
4-23-12*

MOTION TO JOIN CO-DEFENDANT ANDREW KAYACHITH'S MOTION FOR
DISMISSAL (D.E. # 2392)

Comes now the Defendant Yassin Yusuf, through counsel, and respectfully moves this Honorable Court to allow him to join Co-Defendant Andrew Kayachith's motion for dismissal with prejudice of all counts in the second superseding indictment pertaining to or related to testimony of JD2 (D.E. # 2392). In addition to the facts contained in Co-Defendant Kayachith's motion Defendant Yusuf would show as follows:

1. On April 10, 2012 the Government in its direct examination of JD2 asked if the Rochester trip had anything to do with sex trafficking and she replied (according to page 63 of the April 10, 2012 of the rough draft transcript) "We went to Rochester and we were supposed to go to these apartment but we didn't make it there, and they knew people at the apartment want that wanted to have sex." Never, ever did JD2 ever make this allegation before her testimony at trial. She did make previous conflicting allegations about a chance meeting with a potential African John at a gas station in which (depending on which day you ask her) she was going to be prostituted for \$200 or sold as a sex slave for several thousands of dollars. Even the first version of these allegations, however, came on September 8, 2009 after several interviews of which there were no sex allegations whatsoever;